

# California Commission on Aging

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GAVIN NEWSOM, Governor

**Executive Director**  
Karol Swartzlander

December 29, 2020

Secretary Mark Ghaly, California Health and Human Services Agency  
Erica Pan, MD, MPH, Acting Public Health Officer, CDPH, Co-Chair  
Nadine Burke Harris, MD, MPH, California Surgeon General, Co-Chair  
Community Vaccine Advisory Committee  
California Department of Public Health

Via Email: [COVID19vaccineoutreach@cdph.ca.gov](mailto:COVID19vaccineoutreach@cdph.ca.gov)

Re: Allocation Guidelines for COVID-19 Vaccination During Phase 1A

Dear Dr.'s Ghaly, Pan and Burke Harris,

The California Commission on Aging (CCoA) is the principal advocate for older adults under California Welfare and Institutions Code. As such, the Commission would like to offer comment on the Allocation Guidelines for COVID-19 Vaccinations During Phase 1A. Our primary concerns are for increased prioritization of isolated and homebound older adults and the persons that care for them. Among our recommendations are:

- Older adults age 75 and over, and particularly those in disproportionately impacted communities, be moved into the Phase 1A, Tier 2 level for vaccination. We appreciate the Community Vaccine Advisory Committee's awareness of the heightened vulnerability of these older adults to infection and death.
- Elevate residential care staff working with vulnerable residents to the Phase 1A, Tier-1 level in order to protect both essential care staff and the residents who depend on them.
- Include in Phase 1 informal caregivers, millions of whom provide essential care to medically vulnerable adults and persons with disabilities, helping them to remain in their homes.

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Sacramento

CCoA's detailed recommendations are attached. We would be happy to provide additional information regarding our recommendations at your request.

Thank you for your work on this most critical issue.

Sincerely,

A handwritten signature in blue ink that reads "E. Schmeding". The signature is written in a cursive style with a large initial "E" and a long, sweeping underline.

Ellen Schmeding  
Chair